Conesville NOV Conference
2016-08-16
Statement by Janet Henry

Appreciate the Region's willingness to discuss the NOV with us, and the schedule accommodations made to allow for a longer period to respond to the 114 request and receive information from the Region regarding the opacity observations that formed the basis for the NOV.

Have provided detailed information about the emissions from the units at Conesville, including stack test results, COM data, operational information, attempted Method 9 readings by plant staff, and other operational information. Will focus the discussions on Unit 6, which is the unit where the Region alleges that opacity exceedances have occurred.

There is conclusive evidence that mass emissions of PM are well below allowable limits. The most recent test of Conesville Units 5 and 6, conducted in June 2016 (demonstrating compliance with the MATS standard), show PM emissions of 0.0038 lb/mmBtu, a fraction of 1% if the NSPS and SIP mass emission limit of 0.10 lb/MMBtu. Prior tests for Unit 6 operating independently showed particulate emissions averaged 0.0057 lb/mmBtu in October 2015. VE readings performed that day showed opacity at 10%.

COMs data collected at the unit demonstrate that periods of excess opacity are generally rare, less the 1.5% of the unit operating time, and primarily associated with periods of start-up and shutdown when the ESP is not engaged due to safety concerns. There have also been brief periods when the monitor was obscured by condensation and minor exceedances during load changes.

In addition, under the NSR consent decree, scrubber efficiency is regularly reported to EPA, and is maintained at 95% or more.

There is no ambient air quality standard for opacity. Opacity is not a regulated air pollutant. OAC 3745-17-07(A) and 40 CFR 60.42(a)(2) are standards for "particulate matter" emissions. Opacity is used as a surrogate for particulate matter emissions in OAC 3745-17-07(A) and 40 CFR 60.42(a)(2). When a source is in compliance with mass emission limits for particulate matter, opacity provisions are not independently enforceable. 40 CFR 60.12(e)(8) provides for an adjusted opacity standard that can be met "at all times the source is meeting the mass or concentration emission standard."

The NOV does not show evidence that opacity readings were conducted in accordance with Method 9. The opacity readings appear to have been influenced by condensed water and/or aerosols formed in the atmosphere. Photographs from the Alternative Method 082 confirm that plumes commingled on the days observations were made, that obstructions were present between the observers and the stacks, and that contrast and other ambient conditions are the dominant factors influencing the appearance of the plumes.

Method 9 is particularly challenging and unreliable for determining the opacity of a wet (scrubbed) plume. The readings furnished by Region 5 are particularly deficient because of the distance of the observer from the stacks, the failure to take observations perpendicular to the plume, the failure to exclude the effect of condensed or uncombined water vapor on the readings, and the confounding effects of plumes from two stacks. Alternative Method 082 is not an approved compliance method that is mandatory for use at existing stationary sources. It can be voluntarily adopted by operators. It is not appropriate for use at Conesville due to the size of the stack, the scrubbed plume, and the prevailing ambient conditions during much of the year.

Conesville Units 4, 5, and 6 are subject to multiple layers of regulation for emissions of PM and other pollutants regulated under the Clean Air Act, and have demonstrated compliance with all applicable requirements.